

COUNTY OF LOS ANGELES DEPARTMENT OF AUDITOR-CONTROLLER

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December 14, 2006

TO:

Supervisor Zev Yaroslavsky, Chairman

Supervisor Gloria Molina Supervisor Yvonne B. Burke

Supervisor Don Knabe

Supervisor Michael D. Antonovich

FROM:

J. Tyler McCauley

Auditor-Controller

SUBJECT:

ASSOCIATED LEAGUE OF MEXICAN AMERICANS, DBA ALMA

FAMILY SERVICES CONTRACT COMPLIANCE REVIEW

We have completed a contract compliance review of the Associated League of Mexican Americans, dba ALMA Family Services (ALMA or Agency), a Department of Mental Health (DMH) service provider.

Background

DMH contracts with ALMA, a private, non-profit, community-based organization, which provides services to clients in Service Planning Area 7. Services include interviewing program clients, assessing their mental health needs, and developing and implementing a treatment plan.

Our review focused on approved Medi-Cal billings where at least 35% of the total service cost was paid using County General Funds. At ALMA, these services include Targeted Case Management Services, Mental Health Services, and Medication Support Services. The Agency's headquarters is located in the First District.

DMH paid ALMA between \$1.54 and \$3.73 per minute of staff time (\$92.40 to \$223.80 per hour). DMH contracted with ALMA to provide approximately \$5.4 million in services for Fiscal Year 2005-06.

Purpose/Methodology

The purpose of the review was to determine whether ALMA provided the services outlined in their contract with the County. Our monitoring visit included a review of a sample of ALMA's billings, participant charts, and personnel and payroll records. We also interviewed staff from ALMA and a sample of the clients' parents and guardians.

Results of Review

Overall, ALMA provided the services billed in accordance with their County contract. The Agency used qualified staff to perform the services billed and the clients interviewed stated that the services they received met their expectations. However, the Agency provided 432,000 (64%) less Targeted Case Management Service units than planned without prior written authorization from DMH to deviate from planned services.

ALMA also did not complete the Client Care Plan for 12 (32%) of 37 clients sampled, in accordance with the County contract.

We have attached the details of our review, along with recommendations for corrective action.

Review of Report

We discussed the results of our review with ALMA on September 7, 2006. In their attached response, the Agency generally agreed with the results of our review and described their corrective actions to address the findings and recommendations contained in the report.

We thank ALMA management for their cooperation and assistance during this review. Please call me if you have any questions, or your staff may contact Don Chadwick at (626) 293-1102.

JTM:MMO:DC

Attachment

c: David E. Janssen, Chief Administrative Officer Dr. Marvin J. Southard, Director, Department of Mental Health Jean Champommier, CEO, ALMA Family Services Public Information Office Audit Committee

COUNTYWIDE CONTRACT MONITORING REVIEW FISCAL YEAR 2005-2006 ASSOCIATED LEAGUE OF MEXICAN AMERICANS, DBA ALMA FAMILY SERVICES

BILLED SERVICES

Objective

Determine whether the Associated League of Mexican Americans, dba ALMA Family Services (ALMA or Agency) provided the services billed in accordance with their contract with Department of Mental Health (DMH).

Verification

We judgmentally selected 4,244 minutes from 74,974 service minutes of approved Medi-Cal billings to DMH where at least 35% of the total service cost was paid using County General Funds. We reviewed the Assessments, Client Care Plans, and Progress Notes maintained in the clients' charts. The 4,244 minutes represent services provided to 37 program clients.

Although we started our review in June 2006, the most current billing information available from DMH's billing system was November and December of 2005.

Results

Overall, ALMA provided the services billed in accordance with their County contract. However, the contractor did not sufficiently document billings for 271 (6%) of the 4,244 minutes sampled in compliance with the County contract. Specifically:

- The Agency billed 190 minutes for Mental Health Services in which the Progress Notes did not describe what the client or service staff attempted and/or accomplished towards the client's goals.
- The Agency billed for 81 minutes in which more than one staff was present during an intervention but the Progress Notes did not describe the specific contribution of each staff person.

Assessments and Client Care Plans

ALMA did not complete annual Assessments for three of the 37 (8%) clients sampled. An Assessment is a diagnostic tool used to document the clinical evaluation of each client and establish the client's mental health treatment needs. The contract requires the Agency to complete an Assessment annually.

ALMA also did not complete the Client Care Plans for 12 (32%) of 37 clients sampled in accordance with the County contract. The Client Care Plan establishes goals and

interventions that address the Mental Health issues identified in the client's Assessment. Specifically, we noted the following:

- Ten charts did not contain Client Care Plans for each type of treatment provided.
- One Client Care Plan did not contain observable and/or quantifiable goals.
- One Client Care Plan was not signed by the participant or legally responsible adult.

Recommendations

ALMA management:

- 1. Properly document all services billed to DMH.
- 2. Ensure that Assessments are completed annually for each client.
- 3. Ensure that Client Care Plans contain specific and quantifiable goals and ensure that the Plans are developed and signed by the client for each service provided.

CLIENT VERIFICATION

Objectives

Determine whether the program clients received the services that ALMA billed DMH.

Verification

We interviewed seven clients that ALMA billed DMH for services during November and December 2005.

Results

The seven program clients interviewed stated that the services they received from the Agency met their expectations.

Recommendation

There are no recommendations for this section.

STAFFING LEVELS

Objective

Determine whether the Agency maintained the appropriate staffing ratios for applicable services.

We did not perform test work in this section, as the Agency does not provide services that require staffing ratios for the funding programs that we reviewed.

STAFFING QUALIFICATIONS

Objective

Determine whether ALMA treatment staff possessed the required qualifications to provide the services.

Verification

We reviewed the California Board of Behavioral Sciences' website and/or the personnel files for 20 (48%) of 42 ALMA treatment staff for documentation to support their qualifications.

<u>Results</u>

Each employee in our sample possessed the qualifications required to deliver the services billed.

Recommendation

There are no recommendations for this section.

SERVICE LEVELS

Objective

Determine whether ALMA's reported service levels varied significantly from the service levels identified in the DMH contract.

Verification

We reviewed ALMA's Fiscal Year 2004-05 Cost Report and compared the dollar amount and billed service units to the contracted service units identified in the contract for the same period.

Results

ALMA operated within its maximum cost reimbursement contract amount of \$4.7 million. However, ALMA significantly deviated from contracted service levels without prior written authorization from DMH. Specifically, the Agency provided 432,000 (64%) less Targeted Case Management Service units and 147,000 (9%) less Mental Health Service units than contracted.

Recommendation

4. ALMA management obtain written authorization from DMH prior to deviating from contracted service levels.



Progress through Commitment to Excellence Celebrating Thirty Years of Service

October 24, 2006

County of Los Angeles Department of Auditor-Controller J. Tyler McCauley, Auditor-Controller Kenneth Hahn Hall of Administration 500 West Temple Street, Room 525 Los Angeles, CA 90012-2766

Dear Mr. McCauley,

ALMA Family Services has received the results from the auditor-controller audit for services rendered for the months of November and December 2005. Our response is as follows:

Billed Services

Recommendation 1: Properly document all services billed to DMH

On April 26, 2006 ALMA Family Services provided a documentation training (See attachment A) to address progress note documentation for case consultations. The staff training provided samples on how staff can document each staff member's contribution when providing a service. The training assisted staff on documentation to describe what the service staff attempted toward the client goals when providing a service to the client.

Recommendation 2: Ensure that Assessments are completed annually for each client

Effective June 19, 2006 ALMA Family Services developed an addendum to the Quality Improvement plan (attachment B) to insure that Annual Assessment Updates are completed within the window period. Our agency will utilize a data base to track and monitor the window period during which the Annual Assessment Updates are to be completed. Agency will monitor the data base on a daily basis to ensure that the quality of services are provided to the client.

Recommendation 3: Ensure that Client Care Plans contain specific and quantifiable goals and ensure that the Plans are developed and signed by the client for each service provided.

Effective June 19, 2006 ALMA Family Services developed an addendum to the Quality Improvement plan (attachment B) to insure that Client Care Plans are completed within the window period. Our agency will utilize a data base to track and monitor the window period during which the Client Care Plans are to be completed. Agency will monitor the data base on a daily basis to ensure the quality of services is provided to the client and that each service billed has a Client Care Plan.

Quality Improvement has developed an intensive training for staff on developing specific, measurable, quantifiable goals for the Client Care Plan. The training includes reviewing with staff the need to obtain the client and/or parent/guardian's signature or written explanation of client's refusal or unavailability to sign, as required.

Service Levels

Recommendation 4: ALMA management obtains written authorization from DMH prior to deviating from contracted service levels.

The tracking of the service levels will be incorporated into the database system which is being developed.

If additional information is desired please contact me.

Sincerely,

Jean G. Champommier, Ph.D.

Chief Executive Officer ALMA Family Services

cc: Mayor Michael D. Antonovich

Supervisor Gloria Molina Supervisor Yvonne B. Burke Supervisor Zev Yaroslavsky Supervisor Don Knabe

Dr. Marvin J. Southard, Director, Department of Mental Health

ATTACHMENT A

ALMA FAMILY SERVICES

Memo

TO:

Cal-Works; Case Managers; Clinicians; Interns; Support Staff

FROM:

Marcella Mendez, LCSW QI Coordinator & Clinical Supervisor

Date:

April 26, 2006

RE:

Documentation on two or more staff Claiming a Service

As of today's date when two or more staff are billing for a service the progress note needs to document the time each staff is billing from the Client (Unit) Service Log. In addition, the note needs to indicate each staffs' contribution/intervention to the service. Please see the example below where the Client (Unit) Service Log time matches the progress notes time and states the contribution/intervention of each staff to the consultation/session..

Please feel free to contact me if you have any questions. Thank you

Employee Name						OTHER STAFF PARTICIPATING	
Last, First Name	Procedure Code	Collateral		FtF Time	Other Time	Employee Name Last, First Name	Other Time
		Family	Non Family	Hr/Min	Hr/Min		Hr/Min
Mendez, Marcella	99361	0	0	0	26	Segovia, Kelly	15

Procedure	Current Status of Goal:			
Code: 99361	Assist and facilitate the client to decrease depressive symptoms			
	Therapist's Intervention:			
Location: 11				
Telephone:	Therapist consulted with director regarding appropriate interventions			
FTF Time: 0	Therapist provided the director with the client history and			
Direct client contact	Director Segovia provided several interventions that would assist the			
	client			
OT Time: 41	Client's Response:			
K. Segovia: 15	Client not present.			
M. Mendez: 26	Plan:			
documentation	Therapist will incorporate new interventions at the next			

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ATTACHNENT B

ALMA FAMILY SERVICES ADDENDUM QUALITY IMPROVEMENT PLAN JUNE 2006 MEDICATION DEPARTMENT

Quality Review team has determined an improvement plan for medications services at ALMA Family Services. The goal of this plan is to improve the quality of mental health services for clients who are receiving medication services at our agency. The improvement plan will assist clients in determining treatment goals to reduce symptomology and improve client functioning and quality of life. In addition, the plan will assist in determining client medical necessity and the need for on-going services here at our agency.

The medication support team has been developed so that services provided to our clients are supported and documented through the development of Client Care Plans and Annual Assessment Updates. The Medication Support Team will ensure that all Client Care Plans and Annual Assessment Updates are completed within the window period. Medication support team members are as follows: Director of Behavioral Health, Quality Improvement Coordinator, Licensed Psychiatric Technician, and Case Managers.

The medication support team plan is to ensure Client Care Plans are completed within the window period. The team will review each chart one week prior to scheduled doctor appointments to determine the necessary documentation that is required to assist the client to achieve their treatment goals. The chart will be reviewed to determine client progress toward goals and to develop the necessary documentation to accurately reflect the client's progress.

For new clients who are referred to medication supportive services, the team will determine, after the psychiatric evaluation, if services will be on-going. Client's who continue to receive medication supportive services will be actively involved in developing a medication treatment plan with the doctor, case manager and LPT.

The agency will utilize a data base to track and monitor the window period during which the Client Care Plans and Annual Assessment Updates are to

be completed within. The team will monitor the data base on a daily basis to ensure that quality of services are provided to the client.

The agency has improved the medication consent form to include all medications that may be prescribed to clients. The consent form has been changed from "Consent for Anti-psychotic Medications" to "Consent for Psychotropic Medications" effective June 2006.

Effective July 1, 2006 ALMA Family Services has incorporated a new medication service progress note. The progress note has been developed to increase the quality of supportive documentation that accurately reflects the services being provided to the client receiving medication services. The progress note will address the following:

- Current client symptoms
- Client data: weight, height, BMI
- Client side effects to medication prescribed
- Client compliance to medications
- Client mental status exam
- Client response to medications
- Medication treatment plan: prescribed medications, dosage and frequency

ALMA Family Services continues to strive to improve the quality of services to the clients we serve. We will continue to provide our clients mental health services to improve client functioning and quality of life. We recognize the need to make improvements within our agency and will incorporate immediate modifications to improve our services.

Dr. Muralles
Medical Director

Cynthia Baker, I.CSW
Director of Behavioral Health

Marcella Mendez, LCSW

Quality Improvement Coordinator

Lagrange Date

Date

Date